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**FILED**  
Clerk  
District Court

**JUN 12 2008**

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**ESTERLITA D. ELIARES, YOLLY M.  
LABORCE, MA. NIEVA V.  
LORENZO, MARIETA P. MORA,  
GRACE R. NAVARRETE, OLIVIA S.  
ODON, JESSICA E. ORTIZO, and  
GERTRUDEZ U. RINON,**

Civil Action No. **CV 08 - 0027**

**COMPLAINT**

**Plaintiffs,**

**-v-**

**L&T INTERNATIONAL  
CORPORATION,**

**Defendant.**

**I  
NATURE OF THE ACTION**

1. This is an action against Defendant under Title VII of Civil Rights Act of 1964 (Title VII), 42 U.S.C. §§ 2000e., *et seq.*, as amended for its unlawful,

1 discriminatory, and retaliatory employment practices towards Plaintiffs in violation of  
2 Plaintiffs' federally-protected rights.

3 2. Plaintiffs complain about employment discrimination based on national  
4 origin, retaliatory discharge, and other impermissible grounds described in this  
5 Complaint, including, but not limited to: (a) discriminatory policies, practices, and/or  
6 procedures in hiring, firing, and layoffs; and (b) retaliatory discharge of Plaintiffs for  
7 filing an EEOC charge against Defendant or otherwise testifying, assisting, or  
8 participating in any manner in the investigation or proceeding involving or related to  
9 the said EEOC charge. Plaintiffs are seeking lost earnings, lost employment benefits,  
10 punitive, exemplary, compensatory, incidental, consequential damages, costs, and  
11 attorney's fees to redress Defendant's unlawful and discriminatory employment  
12 policies, practices, and/or procedures.

## 13 14 II JURISDICTION AND VENUE

15 3. Title VII applies to this matter through the Covenant to Establish a  
16 Commonwealth of the Northern Mariana Islands in Political Union with the United  
17 States of America, Article V, § 502(a)(2).

18 4. This Court has jurisdiction over Plaintiffs' Title VII claims pursuant to  
19 42 U.S.C. § 2000e-5(e)(3), 28 U.S.C. § 1331(a) (federal question jurisdiction), and  
20 28 U.S.C. § 1337(a) (proceedings arising under any Act of Congress regulating  
21 commerce).

22 5. This action is authorized and instituted pursuant to 42 U.S.C. §§ 2000e-  
23 (f)(1) and (3) of Title VII..

24 6. Venue in this Court is proper pursuant to 28 U.S.C. § 1391 and  
25 42 U.S.C. § 2000e-5.(f)(3) because Defendant's unlawful and discriminatory

1 employment practices alleged herein were committed in Saipan, Commonwealth of  
2 the Northern Mariana Islands.

3 **III**  
4 **PROCEDURAL REQUIREMENTS**

5 7. On different dates in March and April 2006, Plaintiffs filed charges of  
6 discrimination with the Equal Employment Opportunity Commission ("EEOC") in  
7 Saipan, Commonwealth of the Northern Mariana Islands. The charges were filed  
8 within one hundred eighty (180) days after the occurrence of one or more of the  
9 unlawful and discriminatory employment practices alleged herein pursuant to  
10 42 U.S.C. § 2000e.5(e)(1).

11 8. On or about March 3, 2008, the EEOC issued to each Plaintiff a Notice  
12 of Right to Sue (Conciliation Failure). Plaintiffs are filing this complaint within ninety  
13 (90) days after the date they received the Notices of Right to Sue in compliance with  
14 42 U.S.C. § 2000e-5(f)(1) and 29 U.S.C. § 626(e). Attached hereto as **Exhibits "1"** to  
15 **"8"** and incorporated by reference are copies of the Notices of Right to Sue.

16 9. All jurisdictional prerequisites to the institution of this lawsuit have been  
17 fulfilled, and Plaintiffs have exhausted their administrative remedies as required by  
18 law.

19 **IV**  
20 **PARTIES**

21 10. Plaintiffs, at all relevant times, were residing in Saipan, Commonwealth  
22 of the Northern Mariana Islands (CNMI), and were employees of Defendant, within  
23 the meaning of 42 U.S.C. § 2000e.(f).  
24  
25

11. Defendant **L&T INTERNATIONAL CORPORATION**, is, and at all relevant times was, a corporation organized and existing under the laws of the CNMI having its principal place of business in Saipan, CNMI.

12. Defendant is, and at all relevant times was, engaged in an industry affecting commerce as defined under 42 U.S.C. § 2000e(g)(h) with more than 20 employees and was an employer of Plaintiffs within the meaning of 42 U.S.C. § 2000e(b).

## V STATEMENT OF FACTS

13. Plaintiffs are all foreign national workers from the Republic of the Philippines.

14. Plaintiffs were employed in various capacities and performed work at Defendant's garment factory beginning sometime in 2004 pursuant to renewable written employment contracts approved by the CNMI Department of Labor (DOL).

15. Defendant, at all relevant times, also employed other, Chinese workers under similar renewable written employment contracts.

16. Sometime in May, 2005, Defendant terminated the employment contracts of Plaintiffs due to a purported reduction in force.

17. At that time, Defendant continued to hire other, Chinese workers and continuously renewed Chinese workers who were already employed.

18. On different dates in June, 2005 and July, 2005, Plaintiffs Eliares, Lorenzo, Mora, Navarrete, Odon, and Rinon filed complaints for discrimination based on national origin, among others, with the Equal Employment Opportunity Commission (EEOC).

1           19. The above-named Plaintiffs, including Plaintiffs Laborce and Ortizo and  
2 other workers, also filed related labor complaints at the CNMI Department of Labor  
3 (DOL). DOL then instituted Compliance Agency Case No. 05-100-05 entitled  
4 Director of Labor vs. L&T International Corporation and Compliance Agency Case  
5 No. 05-101-06 entitled Director of Labor vs. Concorde Garment Manufacturing  
6 Corporation.

7           20. On or about November 21, 2005, a Stipulated Settlement Agreement  
8 was entered by the parties in C.A.C. Nos. 05-100-05 and 05-101-06. The settlement  
9 agreement provided for the reinstatement of Plaintiffs and the other complaining  
10 workers.

11           21. Upon their reinstatement to work, Plaintiffs resumed performing their  
12 duties competently and in an excellent manner.

13           22. Sometime in January 2006, Defendant informed each Plaintiff that their  
14 employment contracts will not be renewed on their expiration dates.

15           23. Plaintiffs were surprised because Defendant had not previously  
16 informed them about any performance issue that could have justified the non-renewal  
17 of their employment contracts.

18           24. Plaintiffs are also informed and believe, and thereupon allege, that after  
19 they were terminated, Defendant hired additional Chinese workers and continued to  
20 renew other Chinese workers.

21           25. Plaintiffs believe that they were terminated by Defendant because of  
22 national origin.

23           26. Plaintiffs also believe that they were terminated because they made a  
24 charge, or otherwise testified, assisted, or participated in the first EEOC complaint  
25 filed by Plaintiffs in June and July, 2005.

27. With respect to Plaintiffs Eliares, Lorenzo, Mora, Navarrete, Odon, and Rinon, the EEOC determined that “[L&T] discharged [Plaintiffs] and a class of employees in retaliation for engaging in protected activity and that the evidence is sufficient to establish a violation of Title VII of the Civil Rights Act of 1964, as amended.” Attached hereto as **Exhibits “9” to “14”** and incorporated by reference are copies of the Determination dated September 26, 2007.

28. With respect to Plaintiffs Laborce and Ortizo, the EEOC had determined that they “and a class of employees were discharged because of their association with employees who engaged in protected activity and that the evidence is sufficient to establish a violation of Title VII of the Civil Rights Act of 1964, as amended.” Attached hereto as **Exhibits “15” to “16”** and incorporated by reference are copies of the Determination dated September 26, 2007.

29. As a result of Defendant's pattern and practice of discrimination based on national origin and its retaliation against Plaintiffs for engaging in protected activities, Plaintiffs experienced harm, including loss of earnings, wages, and other employment benefits. Plaintiffs' discrimination at work was so severe and pervasive that it affected the terms and conditions of their status as employees.

## VI CAUSES OF ACTION

**First Cause of Action**  
National Origin Discrimination

30. Paragraphs 1 through 29 above are incorporated herein by reference as if fully pleaded in this First Cause of Action.

1        31. Defendant's discrimination of Plaintiffs on account of their national  
2 origin constitutes an unlawful employment practice in violation of 42 U.S.C. § 2000e-  
3 2(a)(1)(2).

4        32. Defendant's unlawful and discriminatory practices as alleged above  
5 deprived Plaintiffs of equal employment opportunities or otherwise adversely affected  
6 their status as employees due to their national origin.

7        33. As a direct and proximate result of Defendant's unlawful and  
8 discriminatory practices based on national origin, Plaintiffs have suffered and  
9 continue to suffer loss of earnings and other employment benefits which they  
10 otherwise would have earned.

11        34. Defendant engaged in the above-described conduct against Plaintiffs  
12 with malice and in reckless disregard of Plaintiffs' federally-protected rights thereby  
13 entitling each Plaintiff to punitive damages in an amount to be determined at trial.

14  
15                    **Second Cause of Action**  
16                    Retaliatory Discharge

17        35. Paragraphs 1 through 34 above are incorporated herein by reference as if  
18 fully pleaded in this Second Cause of Action.

19        36. Defendant willfully violated Section 2000e-3(a) by terminating the  
20 employment of Plaintiffs Eliares, Lorenzo, Mora, Navarrete, Odon, and Rinon  
21 because they filed an EEOC complaint against Defendant and by terminating the  
22 employment of Plaintiffs Laborce and Ortizo for their association with those who  
23 filed an EEOC complaint or otherwise testifying, assisting, or participating in the said  
24 EEOC complaint.  
25

1 37. The termination of Plaintiffs' employment caused them to suffer  
2 substantial damages for past and pecuniary losses, mental anguish, humiliation, loss of  
3 enjoyment of life, and other non-pecuniary losses.

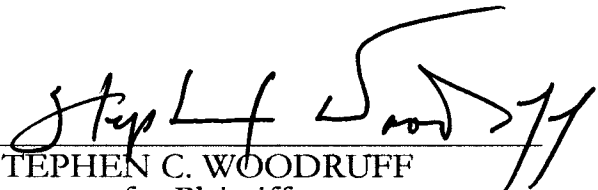
4 38. Defendant had acted maliciously and with reckless disregard of  
5 Plaintiffs' federally protected rights by retaliating against Plaintiffs thereby entitling  
6 each of them to punitive damages in an amount to be determined at trial.

7  
8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs respectfully request for the following relief:

- 10 (1) An award of lost earnings and lost benefits, and punitive  
11 damages to each Plaintiff according to law and proof under the  
12 First Cause of Action;
- 13 (2) An award of lost earnings and lost benefits, punitive and other  
14 damages to each Plaintiff according to law and proof under the  
15 Second Cause of Action;
- 16 (3) An award of reasonable attorney's fees and costs; and  
17 (4) Such other and further relief as this Court deems just and  
18 proper.

19  
20 DATED this 11<sup>th</sup> day of June 2008.

21  
22   
23 STEPHEN C. WOODRUFF  
24 Attorney for Plaintiffs  
25



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE  
(CONCILIATION FAILURE)

To: Esterita D. Elkaras  
Chasen Kanoa  
Saipan, MP 96950

From: Honolulu Local Office  
300 Ala Moana Blvd  
Room 7-127  
Honolulu, HI 96850

☐ On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(e))

EEOC Charge No.	EEOC Representative	Telephone No.
486-2006-00080	James S. Yao, Investigator	(808) 541-3118

## TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)


**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Enclosures(s)

  
Timothy A. Riera,  
Director

3/3/08  
(Date Mailed)

cc: L&T International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10001  
Saipan, MP 96950

EXHIBIT 1

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE  
(CONCILIATION FAILURE)

To: Yolly Records  
P.O. Box 304202  
Saipan, MP 96950

From: Honolulu Local Office  
300 Ala Moana Blvd  
Room 7-127  
Honolulu, HI 96850

☐ On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
466-2006-93077	James S. Yao, Investigator	(808) 541-3118

## TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

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**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission



Timothy A. Riera,  
Director

3/3/08

(Date Mailed)

Enclosure(s):

cc: L&T International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10001  
Saipan, MP 96950

"EXHIBIT 2"

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE  
(CONCILIATION FAILURE)

To: Mariela P. Mora  
PMB 1674 Box 10005  
Saipan, MP 96950

From: Honolulu Local Office  
300 Ala Moana Blvd  
Room 7-127  
Honolulu, HI 96850

☐ On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
485-2006-00093	James S. Yao, Investigator	(808) 541-3138

## TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)


This is the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act. This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice, or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

  
Timothy A. Riera,  
Director

  
Gloria Amador

cc: (b)(6) (b)(7)(C)

cc: L&T International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10001  
Saipan, MP 96950

EXHIBIT 10

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE  
(CONCILIATION FAILURE)

To: Ms. Nieva Lorenzo  
P.O. Box 504721  
Salt Lake City, UT 84150

From: Honolulu Local Office  
330 Ala Moana Blvd  
Room 7-127  
Honolulu, HI 96850

On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR § 1601.7(a))

EEOC Charge No.	EEOC Representative	Telephone No.
636-2006-00082	James S. Yao, Investigator	(808) 541-3118

## TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

*Timothy A. Riera*

Timothy A. Riera,  
Director

6/3/08

(Date Mailed)

Let International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10061  
Salt Lake City, UT 84150

EXHIBIT 4

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE  
(CONCILIATION FAILURE)

To: Grace R. Navarrete  
Pmb 1522, P.O. Box 10006  
Saipan, MP 96950

From: Honolulu Local Office  
300 Ala Moana Blvd  
Room 7-127  
Honolulu, HI 96850

On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Charge No.

488-2006-00094

James S. Yao,  
Investigator

63101-040-3019

## TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the above-numbered charge. The EEOC found reasonable cause to believe that violations of the statute(s) occurred with respect to some or all of the matters alleged in the charge but could not obtain a settlement with the Respondent that would provide relief for you. In addition, the EEOC has decided that it will not bring suit against the Respondent at this time based on this charge and will close its file in this case. This does not mean that the EEOC is certifying that the Respondent is in compliance with the law, or that the EEOC will not sue the Respondent later or intervene later in your lawsuit if you decide to sue on your own behalf.

## - NOTICE OF SUIT RIGHTS -

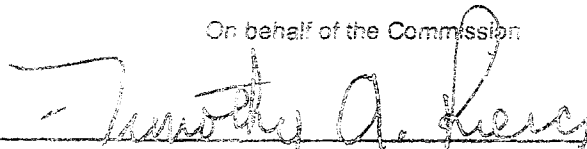
(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

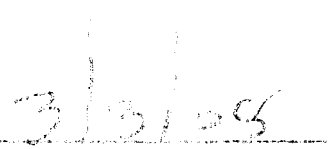
Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission



Timothy A. Riera,  
Director



(Date Mailed)

Enclosures(s)

cc: L&T International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 317 Box 10004  
Saipan, MP 96950

1  
EXHIBIT 11

From: John and Linda HARRIS  
 The Harrises 2101  
 W. 10th St.  
 Anchorage, Alaska 99503

28  
J&T International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10001  
Orlando, FL 32816



## U.S. EQUAL EMPLOYMENT COMMISSION

NOTICE OF RECEIPT  
(OPTIONAL FORM NO. 100)

To: Jessica Orsco  
P.O. Box 501751  
Salt Lake City, UT 84151

From: EEOC Regional Office  
1111 North Main Blvd  
Salt Lake City, UT 84111  
Phone: (801) 462-8850

On behalf of person(s) aggrieved whose identification number is  
CONFIDENTIAL (29 CFR §1601.7(s))

EEOC Charge No. EEOC Representative  
486-2306-00076 James S. Yao,  
Investigator

Page 1 of 1

## TO THE PERSON AGGRIEVED:

We inform you of the EEOC's processing of the above-mentioned charge. The EEOC found that the alleged violations of the statute(s) occurred with respect to some or all of the matter alleged in the charge. We have a meeting with the Respondent that would provide relief for you. In addition, the EEOC has decided not to bring a charge against the Respondent at this time based on this charge and will accept a settlement. This decision by the EEOC is certifying that the Respondent is in compliance with the law, or that the Respondent is not sue the Respondent for any cause of action in your lawsuit if you decide to sue on your own behalf.

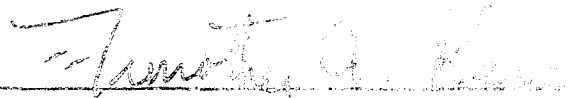
**- NOTICE OF SUIT -**  
(See the additional information enclosed with this notice.)

The Americans with Disabilities Act, Title VII of the Civil Rights Act of 1964, and the Equal Pay Act are federal laws that protect your right of dismissal and of your right to sue that we will send you. You may file a lawsuit against the Respondent, or your federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN the time period specified in this notice or your right to sue based on this charge will be lost. The time period for filing suit may vary by claim and may be different.

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 3 years (3 years from the date of the alleged EPA underpayment. This means that backpay due for any underpayment occurred more than 3 years before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission:



Timothy A. Adams,  
Director



[illegible]  
[illegible]

Enclosure(s):

cc: U3T International  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10001  
Salt Lake City, UT 84151

EEOC-1001 (Rev. 10-07)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Department of Justice  
Washington, D.C. 20547

Guillermo Rinon  
Wiley Hall  
P.O. Box 55574 Ok  
Saipan, MP 96350

Mr. Rinon  
Wiley Hall  
P.O. Box 55574  
Saipan, MP 96350

On behalf of person(s) aggrieved whose claim is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

666-2006-00167

James G. Yau,  
Investigator

TO THE PERSON AGGRIEVED:

This notice concludes the EEOC's processing of the subject complaint. The EEOC has found that there is no violation of the statute(s) occurred with respect to the complaint filed in this case. There is a settlement with the Respondent that would provide relief to the complainant. The EEOC has concluded that there is no basis for a lawsuit against the Respondent at this time based on this complaint. This notice is not a final decision of the EEOC certifying that the Respondent is in compliance with the law. It does not constitute an admission of your lawsuit if you decide to sue on your own behalf.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
(See last page for complete instructions for filing suit.)

The Americans with Disabilities Act (ADA) and the Age Discrimination in Employment Act (ADEA) are federal laws that prohibit discrimination on the basis of disability and age. If you believe you have been discriminated against on the basis of disability or age, you may file a complaint with the EEOC. The EEOC will investigate your complaint and attempt to resolve the dispute. If the EEOC finds that there is no violation of the law, it will issue a notice of no violation. This notice is not a final decision of the EEOC and does not constitute an admission of your lawsuit if you decide to sue on your own behalf.

Equal Pay Act (EPA): EPA suits must be filed within 3 years of the date of the last paycheck received. This means that if you were underpaid, you must file your lawsuit within 3 years of the date of the last paycheck received. If you do not file your lawsuit within this time limit, your suit may not be collectible.

If you wish to sue based on this charge, please send your complaint to the EEOC office.

James G. Yau, Investigator

  
James G. Yau, Investigator

U.S. Equal Employment Opportunity Commission  
c/o Colin Thompson, Esq.  
Attorney at Law  
PMB 917 Box 10001  
Saipan, MP 96350